

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHARITABLE DAF HOLDCO, LTD.
(In Official Liquidation),¹

Debtor in a foreign proceeding.

Chapter 15

Case No. 25-11376 (BLS)

Re: D.I. 6

**CERTIFICATION OF COUNSEL SUBMITTING REVISED ORDER
SCHEDULING A HEARING ON CHAPTER 15 PETITION AND RELATED
RELIEF AND SPECIFYING FORM AND MANNER OF SERVICE OF NOTICE**

I, Jason D. Angelo, Esq., of Reed Smith LLP, counsel for Margot MacInnis and Sandipan Bhowmik, solely in their capacities as the duly authorized joint official liquidators and authorized foreign representatives (together, the “Petitioners”) of Charitable DAF Holdco, Ltd. (In Official Liquidation), the debtor in the above-captioned chapter 15 case (the “Case”), hereby certify and state as follows:

1. On July 22, 2025, the undersigned, on behalf of the Petitioners, filed with the United States Bankruptcy Court for the District of Delaware (the “Court”) (a) *Official Form 401 Petition* [D.I. 1], (b) the *Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representatives, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* [D.I. 3], and (c) the *Motion of Petitioners for Entry of an Order Scheduling a Hearing on Chapter 15 Petition for Recognition and Related Relief and Specifying Form and Manner of Service of Notice* [D.I. 6] (the “Motion”).²

¹ The Debtor is incorporated in the Cayman Islands as an exempted company and registered with registration number 170388. The Debtor’s registered office is located at HSM Corporate Services Limited, P.O. Box 31726, 68 Fort Street, George Town, Grand Cayman, KY1-1207, Cayman Islands.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

2. The Office of the United States Trustee for the District of Delaware (the “U.S. Trustee”) has provided informal comments on the original proposed form of order filed at D.I. 6-1 (the “Original Proposed Order”).

3. As of the date hereof, the undersigned has not received any other informal or formal comments, responses, or objections to the Motion or the Original Proposed Order.

4. A revised proposed form of order resolving the U.S. Trustee’s informal comments to the Original Proposed Order, which has been shared with the U.S. Trustee, is attached as Exhibit A (the “Revised Proposed Order”). The U.S. Trustee does not object to entry of the Revised Proposed Order.

5. For the convenience of the Court and all parties in interest, a blackline of the Revised Proposed Order marked against the Original Proposed Order is attached as Exhibit B.

WHEREFORE, the Petitioners respectfully request that the Court enter the Revised Proposed Order, substantially in the form attached as Exhibit A, at its earliest convenience.

[Remainder of Page Intentionally Left Blank]

Dated: July 23, 2025
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

By:

/s/ Jason D. Angelo

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Casey Laffey, Esq. (*pro hac vice* forthcoming)
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*Counsel to Margot MacInnis and
Sandipan Bhowmik as Joint Official
Liquidators of Chapter 15 Debtor*

EXHIBIT A

Revised Proposed Order

(Attached)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHARITABLE DAF HOLDCO, LTD.
(In Official Liquidation),¹

Debtor in a foreign proceeding.

Chapter 15

Case No. 25-11376 (BLS)

Re: D.I. 6

**ORDER SCHEDULING A HEARING ON CHAPTER 15
PETITION AND RELATED RELIEF AND SPECIFYING
FORM AND MANNER OF SERVICE OF NOTICE**

Upon consideration of the *Motion of Petitioners for Entry of an Order Scheduling a Hearing on Chapter 15 Petition for Recognition and Related Relief and Specifying Form and Manner of Service of Notice* [D.I. 6] (the “Motion”)² filed by counsel for Margot MacInnis and Sandipan Bhowmik, solely in their capacities as the duly authorized joint official liquidators and authorized foreign representatives (the “JOLs” or the “Petitioners”) of Charitable DAF Holdco, Ltd. (In Official Liquidation) (“Debtor”) for entry of an order (this “Order”) under sections 105(a), 1514, and 1515 of the Bankruptcy Code and Bankruptcy Rules 2002 and 9007: (i) scheduling a hearing to consider the recognition of the Cayman Proceeding as a foreign main proceeding under chapter 15 of the Bankruptcy Code (the “Recognition Hearing”) and approving the form and manner of service of notice, substantially in the form attached to this Order as Exhibit 1 (the “Recognition Hearing Notice”), all as more fully described in the Motion; (ii) setting the deadline by which any responses or objections to the *Official Form 401 Petition* [D.I. 1] and the *Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign*

¹ The Debtor is incorporated in the Cayman Islands as an exempted company and registered with registration number 170388. The Debtor’s registered office is located at HSM Corporate Services Limited, P.O. Box 31726, 68 Fort Street, George Town, Grand Cayman, KY1-1207, Cayman Islands.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

Representatives, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code (the “Verified Petition”) [D.I. 3] (together, the “Petition”) must be received; (iii) approving the form of Recognition Hearing Notice; and (iv) approving the manner of service of the Recognition Hearing Notice; and the Court having found that (a) it has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware (Sleet, C.J.), dated as of February 29, 2012, (b) the Motion and the relief requested thereby is a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); and (c) due and sufficient notice of the Motion has been given and no other notice is necessary; and the Debtor asserting venue of this proceeding being proper before the Court pursuant to 28 U.S.C. § 1410(1) and (3); and it appearing that the relief requested in the Motion is in the best interests of the Debtor and other parties in interest in this Chapter 15 Case; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. The Motion is GRANTED as set forth in this Order.
2. The Recognition Hearing is scheduled for August 14, 2025 at 11:00 a.m. (Eastern).
3. All responses, answers, or objections to the Petition or the relief sought thereby must (i) be made pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, (ii) be in writing, (iii) set forth in detail the factual and legal bases therefor, (iv) be filed with the Office of the Clerk of the Court, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and (v) be served upon counsel for the Petitioners, Reed Smith LLP, 1201 North Market Street, Suite 1500, Wilmington, DE 19801 (Attn: Jason D. Angelo, Esq.) and Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attn: Aaron Javian, Esq. and Richard C. Solow, Esq.), so as to be actually received on or before August 7, 2025 at 4:00 p.m. (Eastern).

4. The Recognition Hearing Notice in the form attached to this Order as **Exhibit 1** is approved.

5. Pursuant to Bankruptcy Rule 2002(q) and Local Rule 2002-1(b), the Petitioners will serve, or cause to be served, copies of the Recognition Hearing Notice and the Petition (collectively, the “Notice Documents”) via hand delivery, overnight courier, or domestic or foreign mail, first-class postage prepaid, or, for entities with addresses that are not in the United States, by electronic mail, two (2) business days after entry of this Order (or as soon thereafter as is reasonably practicable) upon the following parties and their counsel, if known (collectively, the “Notice Parties”): (i) the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Joseph J. McMahon, Jr.); (ii) the Debtor; (iii) all persons or bodies authorized to administer foreign proceedings of the Debtor, including the Cayman Proceeding; (iv) all entities against whom provisional relief is being sought under section 1519 of the Bankruptcy Code; (v) all known creditors and contract counterparties of the Debtor in the United States; (vi) all parties to litigation pending in the United States to which the Debtor is a party at the time of the filing of the Petition; (vii) all parties that have filed a notice of appearance in the Chapter 15 Case; (viii) all other parties that have requested notice in these cases pursuant to Bankruptcy Rule 2002; (ix) any other party identified on the “Notice List” attached as **Exhibit 2** to this Order; and (x) such other parties as this Court may direct.

6. In the event any party files a notice of appearance in the Chapter 15 Case subsequent to the Petitioners’ initial service of the Notice Documents as provided in this Order, the Petitioners will serve, or cause to be served on such party, the Notice Documents and any subsequent notices upon that party within three (3) business days of the filing of such notice of

appearance, provided that such documents have not already been served on such party (or its counsel).

7. Subsequent notices in this Chapter 15 Case shall be served in the form and manner set forth in this Order or as otherwise required by the Bankruptcy Code and Bankruptcy Rules or any order entered in this Chapter 15 Case, unless otherwise directed by the Court.

8. Service of the Notice Documents in accordance with this Order is hereby approved as adequate, due, and sufficient notice and service on all interested parties under the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, and no other or further notice is necessary.

9. Prior to serving the Recognition Hearing Notice or causing it to be served, the Petitioners may insert any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order, and make such other and further non-material, non-substantive changes as the Petitioners deem necessary or appropriate.

10. The notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of this Chapter 15 Case or, to the extent applicable, are hereby waived; *provided that*, if the Petitioners initiate a claims resolution process in this Chapter 15 Case, such waiver shall be null and void.

11. Notwithstanding any provision in the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules to the contrary, the Petitioners shall file the certificate of service of the Notice Documents in advance of the Recognition Hearing.

12. The Petitioners are authorized to take all actions necessary to effectuate the relief granted by to this Order.

13. Notwithstanding any applicability of any Bankruptcy Rules, the terms and conditions of this Order shall be immediately effective and enforceable upon its entry.

14. This Court shall retain jurisdiction with respect to all matters arising from or related to the interpretation or implementation of this Order.

EXHIBIT 1

Proposed Form of Notice

(Attached)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHARITABLE DAF HOLDCO, LTD.
(In Official Liquidation),¹

Debtor in a foreign proceeding.

Chapter 15

Case No. 25-11376 (BLS)

Re: D.I. 1, 3, 6

**NOTICE OF FILING AND HEARING ON PETITION SEEKING RECOGNITION
OF FOREIGN PROCEEDING AND RELATED RELIEF PURSUANT TO
CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on July 21, 2025, Margot MacInnis and Sandipan Bhowmik of Grant Thornton Specialist Services (Cayman) Limited, solely in their capacities as the duly authorized joint official liquidators and authorized foreign representatives (the “JOLs” or “Petitioners”) of Charitable DAF Holdco, Ltd. (In Official Liquidation) (“Debtor”), a company in liquidation under Cayman Island law, commenced pursuant to the Cayman Islands Companies Act (2025 Revision) before the Grand Court of the Cayman Islands (the “Cayman Court”) as Cause FSD No. 116 of 2025 (JAJ) (the “Cayman Proceeding”), filed the *Official Form 401 Petition* [D.I. 1] and the *Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representatives, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code* (together, the “Petition”)² [D.I. 3], thereby commencing this proceeding ancillary to the Cayman Proceeding and seeking recognition of the Cayman Proceeding as a foreign main proceeding within the meaning under chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that the Petitioners seek the entry of an order (a) finding that (i) the Debtor is eligible to be a “debtor” under chapter 15 of the Bankruptcy Code, (ii) the Cayman Proceeding is a foreign main proceeding within the meaning of section 1502 of the Bankruptcy Code, (iii) the Petitioners satisfy the requirements of a “foreign representative” under section 101(24) of the Bankruptcy Code, and (iv) the Petition was properly filed and meets the requirements of section 1515 of the Bankruptcy Code; (b) granting recognition of the Cayman Proceeding as a “foreign main proceeding” under sections 1517 and 1520 of the Bankruptcy Code; (c) granting all relief afforded to foreign main proceedings under section 1520 of the Bankruptcy Code; (d) recognizing, granting comity to, and giving full force and effect within the territorial jurisdiction of the United States to the Cayman Proceeding, the Supervision Order, the Injunctive Relief Order, and other orders of the Cayman Court; (e) granting additional relief under sections 1521 and 1507 of the Bankruptcy Code; and (f) granting related relief.

¹ The Debtor is incorporated in the Cayman Islands as an exempted company and registered with registration number 170388. The Debtor’s registered office is located at HSM Corporate Services Limited, P.O. Box 31726, 68 Fort Street, George Town, Grand Cayman, KY1-1207, Cayman Islands.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Verified Petition.

PLEASE TAKE FURTHER NOTICE that on July 23, 2025, the Court scheduled a hearing on the Petition to consider recognition of the Cayman Proceeding as a foreign main proceedings and granting related relief for **August 14, 2025 at 11:00 a.m. (Eastern)** before the Honorable Brendan Linehan Shannon in Courtroom 1 of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware, 19801(the “Recognition Hearing”).

PLEASE TAKE FURTHER NOTICE that copies of the Petition and all documents filed in the Chapter 15 Case are available to parties in interest on the Court’s Electronic Case Filing System, which can be accessed from (i) the Court’s website at <http://www.deb.uscourts.gov> (a PACER login and password are required to retrieve a document); (ii) the JOLs’ website at <https://www.doanegrantthornton.ca/service/advisory/creditor-updates/#Charitable-DAF-Holdco-Ltd>; and (iii) upon written request to the Petitioners’ counsel (including by facsimile or e-mail) addressed to:

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-and-

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PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response, answer, or objection to the Petition must do so pursuant to the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and such response, answer, or objection must (i) be in writing, (ii) set forth in detail the factual and legal bases therefor, (iii) be filed with the United States Bankruptcy Court for the District of Delaware, Office of the Clerk of the Court, 824 Market Street, Wilmington, Delaware 19801, and (iv) served upon counsel for the Petitioners, Reed Smith LLP, 1201 North Market Street, Suite 1500, Wilmington, DE 19801

(Attention: Jason D. Angelo, Esq.), and Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attention: Casey Laffey, Esq., Aaron Javian, Esq., Ian M. Turetsky, Esq., and Richard C. Solow, Esq.), so as to be actually received on or before August 7, 2025 at 4:00 p.m. (Eastern).

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the Petition or the relief requested therein must appear at the Recognition Hearing at the time and place set forth above, which may be adjourned from time to time without further notice except for an in-Court announcement at the Recognition Hearing or a filing on the docket of this Chapter 15 Case of the date and time to which the Recognition Hearing has been adjourned.

PLEASE TAKE FURTHER NOTICE that, at the Recognition Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of the Chapter 15 Case.

PLEASE TAKE FURTHER NOTICE that the Petitioners do not currently intend to conduct a claims process in the Chapter 15 Case. To the extent there is a claims process established in the Cayman Proceeding, parties are directed to the Cayman Proceeding pending before the Cayman Court.

PLEASE TAKE FURTHER NOTICE THAT IF NO RESPONSES OR OBJECTIONS ARE RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE PETITIONERS WITHOUT FURTHER NOTICE OR HEARING.

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Dated: July [●], 2025
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

By:

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-and-

Casey Laffey, Esq. (*pro hac vice* forthcoming)
Aaron Javian, Esq. (*pro hac vice* forthcoming)
Ian M. Turetsky, Esq. (*pro hac vice* forthcoming)
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*Counsel to Margot MacInnis and
Sandipan Bhowmik as Joint Official
Liquidators of Chapter 15 Debtor*

EXHIBIT 2

Notice List

(Attached)

NOTICE PARTY SERVICE LIST**Via Email and/or First Class / International Mail**

NOTICE PARTY NAME	NOTICE PARTY ADDRESS
The United States Trustee	
Office of the United States Trustee	<p>Joseph J. McMahon, Jr. Assistant United States Trustee United States Department of Justice – Office of the United States Trustee J. Caleb Boggs Federal Building 844 N. King Street, Suite 2207, Lockbox 35 Wilmington, DE 19801 joseph.mcmahon@usdoj.gov</p>
Chapter 15 Debtor and Foreign Representative	
Charitable DAF HoldCo, Ltd.	<p>Grant Thornton Specialist Services (Cayman) Limited c/o Margot MacInnis and Sandipan Bhowmik 2nd Floor, Century Yard, Cricket Square P.O. Box 10144 Grand Cayman, Cayman Islands, KY 1-1102 margot.macinnis@uk.gt.com sandipan.bhowmik@uk.gt.com</p>
Court Administering Foreign Proceeding	
Honourable Justice Parker Grand Court of the Cayman Islands	<p>Karen Hoskins Grand Court of the Cayman Islands Financial Services Division 61 Edward St. Albert Panton St. P.O. Box 495 Grand Cayman, KY1-1106 Cayman Islands Karen.Hoskins@judicial.ky</p>
FSD Registrar Grand Court of the Cayman Islands Financial Services Division	<p>Bridget Clare Grand Court of the Cayman Islands Financial Services Division 61 Edward St. Albert Panton St. P.O. Box 495 Grand Cayman, KY1-1106 Cayman Islands Bridget.Clare@judicial.ky</p>

Litigation Parties (Cayman Proceeding)	
Mark Eric Patrick	6716 Glenhurst Drive Dallas, Texas 72554 mpatricktax1040@gmail.com
Paul Murphy	Windsor Village #24 South Church Street Grand Cayman Cayman Islands paul@gkmanagement.com.ky
CDMCFAD, LLC	c/o Campbells LLP The Corporation Trust Company 1209 Orange Street Wilmington, Delaware 19801 RODoherty@campbellslegal.com
DFW Charitable Foundation	c/o Jennier Colegate & Nia Statham Baker & Partners LLP Buckingham Square 720 West Bay Road George Town Grand Cayman KY1-1107 jennifercolegate@bakerandpartners.com niastatham@bakerandpartners.com
CDH GP, LTD.	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
CLO HOLDCO, LTD.	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
Discovery Parties	
BVP Property, LLC	2515 McKinney Avenue, Suite 1100 Dallas, Texas 75201-1945 mpatricktax1040@gmail.com
BVP Property, LLC	c/o Corporation Trust Company Corporation Trust Center 1209 Orange Street, Wilmington New Castle, Delaware 19801 info@ctadvantage.com

Cantor Fitzgerald Securities Corp.	Erica Chase 100 Crescent Court, Suite 1500 Dallas, Texas 75201 Erica.chase@cantor.com
Carrington, Coleman, Sloman & Blumenthal, LLP	Brian P. Shaw Kelli M. Hinson 901 Main Street, Suite 5500 Dallas, Texas 75202-3767 khinson@ccsb.com
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CDHC Fort Worth Land LLC	c/o Mark Patrick 1999 Bryan Street Suite 900 Dallas, Texas 75201-3140 mpatricktax1040@gmail.com cls-compliance@wolterskluwer.com
CDHC Royse City Land LLC	c/o Mark Patrick 1999 Bryan Street Ste 900 Dallas, Texas 75201-3140 mpatricktax1040@gmail.com cls-compliance@wolterskluwer.com
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Hunton Andrews Kurth LLP	Alexander McGeoch 1445 Ross Avenue #3700 Dallas, Texas 75202 amcgeoch@hunton.com
Jefferies, LLC	300 Crescent Court, Suite 500 Dallas, Texas 75201 mediacontact@jefferies.com info@jefferies.com legal@jefferies.com

Mercer (US) LLC	1166 Avenue of the Americas, 30th Floor New York, New York, 10036-2755 info@mercer.com legal@mercer.com
NexBank Capital, Inc.	2515 McKinney Avenue, Suite 1100 Dallas, Texas 75201 Danny.Ambriz@nexbank.com Ileventon@skyviewgroup.com
Sali Fund Management LLC	6850 Austin Center Boulevard, Suite 300 Austin, Texas 78731 contactus@sali.com
Seyfarth Shaw LLP	Douglas Mancino 1075 Peachtree St NE, Suite 2500 Atlanta, Georgia 30309 dmancino@seyfarth.com
SEI Fund Services	1 Freedom Valley Drive Oaks, Pennsylvania 19456 info@seic.com SEIWealthPlatform@seic.com AMD_US@seic.com
Stone Hilton PLLC	Judd Stone 600 Congress Avenue, Suite 2350 Austin, Texas 78748 judd@stonehilton.com
SSB Community Bank	152 N Wooster Avenue Strasburg, Ohio 44680-1136 info@ssbonline.com
Valuescope, Inc.	1400 Thetford Court Southlake, Texas 76092-4225 shastings@valuescopeinc.com
Supporting Entities	
The Highland Dallas Foundation	2101 Cedar Springs Road, Suite 1200 Dallas, Texas 75201 Michael.Stockham@hklaw.com David.Rosenberg@hklaw.com sam.dawson@careyolsen.com nigel.smith@careyolsen.com darren@mccartylawllc.com cmwarner@duanemorris.com
The Dallas Foundation	3963 Maple Avenue, Suite 350 Dallas, Texas 75219-3230 jdiaz@dallasfoundation.org
The Greater Kansas City Community Foundation	1055 Broadway Boulevard, Suite 130 Kansas City, Missouri 64105 wilkerson@growyourgiving.org

The Highland Kansas City Foundation Inc.	2101 Cedar Springs Road, Suite 1200 Dallas, Texas 75201 Michael.stockham@hklaw.com David.Rosenberg@hklaw.com sam.dawson@careyolsen.com nigel.smith@careyolsen.com darren@mccartylawpllc.com cmwarner@duanemorris.com
The Santa Barbara Foundation	1111 Chapala Street, Suite 200 Santa Barbara, California 93101-3100 jcarrera@sbfoundation.org
The Highland Santa Barbara Foundation Inc.	2101 Cedar Springs Road, Suite 1200 Dallas, Texas 75201 Michael.stockham@hklaw.com David.Rosenberg@hklaw.com sam.dawson@careyolsen.com nigel.smith@careyolsen.com darren@mccartylawpllc.com cmwarner@duanemorris.com
The Community Foundation of North Texas	777 Main Street, Suite 2850 Fort Worth, Texas 76102-5303 DMoore@bwllaw.com
HCMLP Charitable Fund	300 Crescent Court, Suite 700 Dallas, Texas 75291
Organizational Parties	
Atlas IDF GP, LLC	c/o Mark Patrick The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, Delaware 19801 info@ctadvantage.com mpatrick@randadvisors.com sraver@randadvisors.com mpatricktax1040@gmail.com
Atlas IDF GP, LLC	c/o Mark Patrick The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, Delaware 19801 info@ctadvantage.com mpatrick@randadvisors.com sraver@randadvisors.com mpatricktax1040@gmail.com

Atlas IDF GP, LLC	c/o Mark Patrick The Partnership 87 Railroad Place, Suite 403 Saratoga Springs, New York 12866 Jhonis@RandAdvisors.com mpatrick@randadvisors.com mpatricktax1040@gmail.com
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Charitable DAF GP, LLC	c/o Mark Patrick The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, Delaware 19801 info@ctadvantage.com mpatrick@randadvisors.com sraver@randadvisors.com mpatricktax1040@gmail.com
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Charitable DAF Holdings Corp.	c/o Mark Patrick CT Corporation System 1999 Bryan Street Suite 900 Dallas, Texas 75201-3140 mpatricktax1040@gmail.com cls-compliance@wolterskluwer.com
Hunter Mountain Investment Trust	c/o Mark Patrick Wilmington Trust, NA Rodney Square North 1100 North Market Street Wilmington, Delaware 19890 mpatricktax1040@gmail.com
Liberty CLO HoldCo, Ltd.	c/o Mark Patrick 6716 Glenhurst Drive Dallas, Texas 75254-8621 mpatricktax1040@gmail.com paul@gkmanagement.com.ky
Allanon Capital Management LLC	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
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Rand Advisors LLC	c/o Mark Patrick 2965 Colonnade Drive, Suite 320 Roanoke, Virginia 24018-3541 mpatricktax1040@gmail.com
Rand Advisors LLC	c/o Mark Patrick 42 Regatta View Drive Saratoga Springs, New York 12866-8307 mpatricktax1040@gmail.com
Rand PE Fund I, L.P.	c/o Mark Patrick The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, Delaware 19801 mpatricktax1040@gmail.com
Rand PE Fund I, L.P.	c/o Mark Patrick The Partnership 87 Railroad Place, Suite 403 Saratoga Springs, New York 12866 mpatricktax1040@gmail.com
Rand PE Fund I, L.P.	c/o Mark Patrick 2101 Cedar Springs Road, Suite 1200 Dallas, Texas 75201-1598 mpatricktax1040@gmail.com
Rand PE Fund I, L.P.	c/o Mark Patrick CT Corporation System 1999 Bryan Street Suite 900 Dallas, Texas 75201-3140 mpatricktax1040@gmail.com
Rand PE Fund Management, LLC	c/o Mark Patrick The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, Delaware 19801 mpatricktax1040@gmail.com
Rand PE Fund Management, LLC	c/o Mark Patrick The LLC 87 Railroad Place, Suite 403 Saratoga Springs, New York 12866 mpatricktax1040@gmail.com
Rand PE Fund Management, LLC	c/o Mark Patrick CT Corporation System 1999 Bryan Street Suite 900 Dallas, Texas 75201-3140 mpatricktax1040@gmail.com
Wilmington Trust, N.A.	1100 North Market Street Wilmington, Delaware 19890

Charitable DAF HoldCo, Ltd.	HSM Corporate Services Ltd. 68 Fort Street George Town PO Box 31726 Grand Cayman hmoses@hsmoffice.com tstewart@hsmoffice.com tpeters@hsmoffice.com
Charitable DAF Fund, L.P.	Charitable DAF Fund, L.P. c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
Crown Global Life Insurance Crown Global Insurance Group, LLC Crown Global Insurance Company of America	100 N. West Street, Suite 1200 Wilmington, Delaware 19801
Charitable DAF HoldCo, Ltd.	Walkers Corporate Services Limited Walker House 87 Mary Street George Town, Grand Cayman KY1-9005 Cayman Islands Geoffrey.Sykes@walkersglobal.com
CDH GP, Ltd.	c/o Campbells LLP Corporate Services Limited, 4th Floor Willow House Cricket Square Grand Cayman KY1-9010 RODoherty@campbellslegal.com
Crown Global Insurance (Cayman) Ltd.	Suite 3206A, 2nd Floor 39 Market Street, P.O. Box 10467 Camana Bay Grand Cayman KY1-1004 Cayman Islands Info@crownglobalinsurance.com
Crown Global Life Insurance	Vivalisurance Services LLC Bahnhofstrasse 11 830 Kloten, Zurich Switzerland info@vivainsurance.services
Crown Global Management, Inc.	801 S. Pointe Drive, Suite 102 Miami Beach, Florida 33139 info@crownglobalinsurance.com

Crown Global Life Insurance, Ltd.	Victoria Place, 5th Floor, 31 Victoria Street, Hamilton HM 10 Bermuda info@crownglobalinsurance.com
HCT HoldCo2, Ltd.	Campbells Corporate Services Limited Floor 4, Willow House, Cricket Square, Grand Cayman, KY1-9010 Cayman Islands gmannning@campbellslegal.com RODoherty@campbellslegal.com
MGM Studios HoldCo, Ltd.	Campbells Corporate Services Limited Floor 4, Willow House, Cricket Square, Grand Cayman, KY1-9010 Cayman Islands gmannning@campbellslegal.com RODoherty@campbellslegal.com
Liberty Sub, Ltd.	c/o Mark Patrick VCorp Services, LLC 108 W. 13th Street, Suite 100 Wilmington, Delaware 19801 mpatricktax1040@gmail.com paul@gkmanagement.com.ky
Liberty CLO HoldCo LLC	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
Liberty CLO HoldCo II LLC	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
Fund Entities	
Charitable DAF Fund 2 LP (Cayman Islands)	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com

Liberty CLO HoldCo, Ltd. (Cayman Islands)	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
DST Investco, LLC (Delaware)	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
Royse City Land Company LLC (Texas)	c/o CT Corporation System 1999 Bryan Street, Suite 900 Dallas, Texas 75201-3140 cls-compliance@wolterskluwer.com
CDHC Stewart Creek LLC (Texas)	6716 Glenhurst Drive Dallas, Texas 75254-8621
BVP Property, LLC	c/o The Corporation Trust Company Corporation Trust Center 1209 Orange Street Wilmington, DE 19801 info@ctadvantage.com
Other Entities	
Franchise Tax Board Chief Counsel	Chief Counsel – Shane Hofeling c/o General Counsel Section P.O. Box 1720, MS: A-260 Rancho Cordova, California 95741-1720 Shane.Hofeling@ftb.ca.gov
Franchise Tax Board	Bankruptcy Section, MS: A-340 P.O. Box 2952 Sacramento, California 95812-2952
Internal Revenue Service	Centralized Insolvency Operation P.O. Box 7346 Philadelphia, Pennsylvania 19101-7346
Michigan Department of Treasury	Tax Policy Division Litigation Liaison 2nd Floor, Austin Building 430 West Allegan Street Lansing, Michigan 48922 Treas-Tax-Compliance@michigan.gov

Kevin Murphy Bankruptcy Administrator Delaware Division of Revenue Bankruptcy Service Bankruptcy Administrator	Carvel State Building 820 N. French Street, 8th Floor Wilmington, Delaware 19801 KevinT.Murphy@delaware.gov
Bettina Dunn, Paralegal Specialist US EPA Region 3	Office of Regional Counsel Four Penn Center Philadelphia, Pennsylvania 19103-2852 Dunn.Bettina@epa.gov
Social Security Administration	Office of the General Counsel Office of Program Litigation Attn: Bankruptcy 6401 Security Boulevard Baltimore, Maryland 21235
Arizona Attorney General's Office	PO Box 6123 MD 7611 Phoenix, Arizona 85005-6123 BankruptcyUnit@azag.gov
Commonwealth of Massachusetts Massachusetts Department of Revenue	Commonwealth of Massachusetts Massachusetts Department of Revenue Collections Bureau/Bankruptcy Unit PO Box 7090 Boston, Massachusetts 02204-7090 bankruptcy@dor.state.ma.us
U.S. Small Business Administration (Philadelphia District Office)	District Counsel 660 American Avenue, Suite 301 King of Prussia, Pennsylvania 19406
Securities & Exchange Commission	100 F Street, NE Washington, DC 20549
Securities and Exchange Commission	Antonia Apps Regional Director 100 Pearl St. Suite 20-100 New York, New York 10004-2616
Delaware State Treasury	820 Silver Lake Blvd., Suite 100 Dover, Delaware 19904
Secretary of State Division of Corporations Franchise Tax	PO Box 898 Dover, Delaware 19903 corp@delaware.gov
Grant J. Scott	5311 Tannat Court Apt. 204 Raleigh, North Carolina 27612 gs@proinbox.com
Grant J. Scott	Highland Capital Management, L.P. 795 Columbus Ave., 12A New York, New York 10025 jpseeryjr@gmail.com

Hueston Hennigan LLP	620 Newport Center Drive, Suite 1300 Newport Beach, California 92660 jhueston@hueston.com
Shield Law	16400 Dallas Parkway, Suite 300 Dallas, Texas 75248 bschaller@shieldslegal.com
Stinson	2200 Ross Avenue, Suite 2900 Dallas, Texas 75201 deborah.deitschperez@stinson.com
Shawn Raver	2620 White Rock Road Dallas, Texas 75214 sraver@hotmail.com
Highland Litigation Sub-Trust	c/o Marc S. Kirschner Litigation Trustee of the Highland Litigation Sub-Trust 280 Park Avenue New York, New York 10117 Marc.kirschner@teneo.com
Highland Capital Management, L.P.	c/o James P. Seery Jr. Trustee of the Highland Claimant Trust and Administrator of the Highland Indemnity Trust jpseeryjr@gmail.com

EXHIBIT B

Blackline of Revised Proposed Order

(Attached)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHARITABLE DAF HOLDCO, LTD. (~~IN
OFFICIAL LIQUIDATION~~In Official
Liquidation),¹

Debtor in a foreign proceeding.

Chapter 15

Case No. 25-11376 (BLS)

Re: D.I. 6

**ORDER SCHEDULING A HEARING ON CHAPTER 15
PETITION~~PETITION~~ AND RELATED RELIEF AND
SPECIFYING FORM AND MANNER OF SERVICE OF
NOTICE**

Upon ~~the motion~~ consideration of the *Motion of Petitioners for Entry of an Order*
Scheduling a Hearing on Chapter 15 Petition for Recognition and Related Relief and Specifying
Form and Manner of Service of Notice [D.I. 6] (the “Motion”)² ~~effiled by counsel for Margot~~
MacInnis and Sandipan Bhowmik, solely in their capacities as the duly authorized joint official
liquidators and authorized foreign representatives (the “JOLs” or the “Petitioners”) of Charitable
DAF Holdco, Ltd. (In Official Liquidation) (“~~HoldCo~~” or the “~~Debtor~~”) for entry of an order
(this “Order”) under sections 105(a), 1514, and 1515 of the Bankruptcy Code and Bankruptcy
Rules 2002 and 9007: (i) scheduling a hearing to consider the recognition of the Cayman
Proceeding as a foreign main proceeding under chapter 15 of the Bankruptcy Code (the
“Recognition Hearing”) ~~on the relief sought in the Verified Petition for (i) Recognition of the
Foreign Main Proceeding, (ii) Recognition of the Foreign Representatives, and (iii) Certain
Related Relief (the “Verified Petition”) and the Chapter 15 Petition for Recognition of a Foreign~~

¹ The Debtor is incorporated in the Cayman Islands as an exempted company and registered with registration number 170388. The Debtor’s registered office is located at HSM Corporate Services Limited, P.O. Box 31726, 68 Fort Street, George Town, Grand Cayman, KY1-1207, Cayman Islands.

² Capitalized terms used but not otherwise defined herein have the meanings ascribed to them in the Motion.

~~Proceeding (together with the Verified Petition, the “Petitions”)~~ and approving the form and manner of service of notice, substantially in the form attached to this Order as Exhibit 1 (the “Recognition Hearing Notice”), all as more fully described in the Motion; (ii) setting the deadline by which any responses or objections to the ~~Petitions~~Official Form 401 Petition [D.I. 1] and the Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representatives, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code (the “Verified Petition”) [D.I. 3] (together, the “Petition”) must be received ~~(the “Objection Deadline”);~~ (iii) approving the form of ~~the notice of this chapter 15 case (the “Chapter 15 Case”), the relief sought in the Petitions, the Objection Deadline, and the~~ Recognition Hearing ~~that is attached as Exhibit 1 to the Order (the “Notice”);~~ and (iv) approving the manner of service of the Recognition Hearing Notice; and the Court having found that (a) it has jurisdiction to consider the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware (Sleet, C.J.), dated as of February 29, 2012; ~~and consideration of,~~ (b) the Motion and the relief requested ~~therein being thereby is~~ a core proceeding pursuant to 28 U.S.C. § 157(b)(2)(P); and (c) due and sufficient notice of the Motion has been given and no other notice is necessary; and the Debtor asserting venue of this proceeding being proper before the Court pursuant to 28 U.S.C. § 1410(1) and (3); and ~~the Court having determined it appearing~~ that the relief requested in the Motion is ~~necessary and beneficial to~~ in the best interests of the Debtor and other parties in interest in this Chapter 15 Case; and after due deliberation and sufficient cause appearing therefor,

IT IS HEREBY ORDERED THAT:

1. ~~1.~~ The Motion is GRANTED as set forth ~~herein~~in this Order.

2. 2. The Recognition Hearing ~~to consider the relief sought in the Petitions shall be held before this Court in Room [•] of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware, on [•], 2025 at [•]:[•].[•].m~~ is scheduled for August 14, 2025 at 11:00 a.m. (Eastern Time).

3. 3. ~~Any party in interest wishing to submit a response, answer, or objection to the Petitions must do so~~ All responses, answers, or objections to the Petition or the relief sought thereby must (i) be made pursuant to the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, ~~and such response, answer, or objection must~~ (ii) be in writing, (iii) set forth in detail the factual and legal bases therefor, (iv) be filed with the ~~United States Bankruptcy Court for the District of Delaware~~, Office of the Clerk of the Court, 824 Market Street, Third Floor, Wilmington, Delaware 19801, and (v) be served upon counsel for the ~~JOLs~~Petitioners, Reed Smith LLP, 1201 North Market Street, Suite 1500, Wilmington, DE 19801 (~~Attention Attn:~~ Jason D. Angelo, Esq.) and Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (~~Attention Attn:~~ Aaron Javian, Esq. and Richard C. Solow, Esq.), so as to be actually received on or before ~~[•]~~August 7, 2025 at [•]:[•].[•].m4:00 p.m. (Eastern Time).

4. 4. The form of Recognition Hearing Notice in the form attached to this Order as Exhibit 1 is ~~hereby~~ approved.

5. ~~Prior to serving the Notice or causing it to be served, the JOLs may insert any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order and make such other and further non material, non substantive changes as the JOLs deem necessary or appropriate.~~

5. 6. Pursuant to Bankruptcy Rule 2002(q) and Local Rule 2002-1(b), the ~~JOLs shall serve the~~Petitioners will serve, or cause to be served, copies of the Recognition Hearing

Notice and ~~Petitions~~the Petition (collectively, the “Notice Documents”) ~~by~~via hand delivery, overnight courier, or domestic or foreign mail, first-class postage prepaid, or, for entities with addresses that are not in the United States, by electronic mail, two (2) business days after entry of ~~the Notice~~this Order, (or as soon thereafter as is reasonably practicable,) upon the following ~~entities or parties and~~ their counsel, if known (collectively, the “Notice Parties”): (i) the United States Trustee for the District of Delaware, J. Caleb Boggs Federal Building, 844 N. King Street, Suite 2207, Lockbox 35, Wilmington, DE 19801 (Attn: Joseph J. McMahon, Jr.); (ii) the Debtor; (iii) all persons or bodies authorized to administer foreign proceedings of the Debtor, including the Cayman Proceeding; (iv) all entities against whom provisional relief is being sought under section 1519 of the Bankruptcy Code; (v) all known creditors and contract counterparties of the Debtor in the United States; (vi) all parties to litigation pending in the United States to which the Debtor is a party at the time of the filing of the ~~Petitions~~Petition; (vii) all parties that have filed a notice of appearance in the Chapter 15 Case; (viii) all other parties that have requested notice in these cases pursuant to Bankruptcy Rule 2002; ~~and~~(ix) any other party identified on the “Notice List” attached as Exhibit B to the Motion (collectively, the “Notice Parties”)~~2~~ to this Order; and (x) such other parties as this Court may direct.

6. ~~7.~~ In the event any party files a notice of appearance in the Chapter 15 Case subsequent to the ~~JOLs~~Petitioners’ initial service of the Notice Documents as provided ~~for~~in this Order, the ~~JOLs~~Petitioners will serve, or cause to be served on such party, the Notice Documents and any subsequent notices upon that party within three (3) business days of the filing of ~~the~~such notice of appearance, ~~if~~provided that such documents have not already been served on such party (or its counsel).

7. 8. Subsequent notices in this Chapter 15 Case shall be served in the form and manner set forth in this Order or as otherwise required by the Bankruptcy Code and Bankruptcy Rules or any order entered in this Chapter 15 Case, unless otherwise directed by the Court.

9. ~~The notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of the Chapter 15 Case or, to the extent applicable, are hereby waived.~~

8. 10. Service of the Notice Documents in accordance with this Order is hereby approved as adequate, due, and sufficient notice and service on all interested parties. ~~Notice provided in accordance with this Order satisfies the requirements of under~~ the Bankruptcy Code, the Bankruptcy Rules, and the Local Rules, ~~including Bankruptcy Rules 2002(p) and (q) and Local Rule 2002-1(b). No and no~~ other or further notice is ~~required~~ necessary.

9. Prior to serving the Recognition Hearing Notice or causing it to be served, the Petitioners may insert any missing dates and other information, correct any typographical errors, conform the provisions thereof to the provisions of this Order, and make such other and further non-material, non-substantive changes as the Petitioners deem necessary or appropriate.

10. The notice requirements set forth in section 1514(c) of the Bankruptcy Code are inapplicable in the context of this Chapter 15 Case or, to the extent applicable, are hereby waived; provided that, if the Petitioners initiate a claims resolution process in this Chapter 15 Case, such waiver shall be null and void.

11. 11. Notwithstanding any provision in the Bankruptcy Code, the Bankruptcy Rules, or the Local Rules to the contrary, the ~~JOLs~~Petitioners shall file the certificate of service of the Notice Documents in advance of the Recognition Hearing.

12. 12. The ~~JOLs~~Petitioners are authorized to take all actions necessary to effectuate the relief granted ~~pursuant by~~ to this Order.

13. ~~13.~~ TheNotwithstanding any applicability of any Bankruptcy Rules, the terms

and conditions of this Order shall be immediately effective and enforceable upon its entry.

14. ~~14.~~ This Court shall retain jurisdiction with respect to all matters

relating~~arising from or related~~ to the interpretation or implementation of this Order.

EXHIBIT 1

Proposed Form of Notice

(Attached)

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

CHARITABLE DAF HOLDCO, LTD. (~~IN
OFFICIAL LIQUIDATION~~In Official
Liquidation),¹

Debtor in a foreign proceeding.

Chapter 15

Case No. 25-11376 (BLS)

Re: D.I. 1, 3, 6

**NOTICE OF FILING AND HEARING ON ~~PETITIONS~~PETITION SEEKING
RECOGNITION OF
FOREIGN PROCEEDING AND RELATED RELIEF PURSUANT TO
CHAPTER 15 OF THE UNITED STATES BANKRUPTCY CODE**

PLEASE TAKE NOTICE that on July 21, 2025, Margot MacInnis and Sandipan Bhowmik of Grant Thornton Specialist Services (Cayman) Limited, solely in their capacities as the duly authorized joint official liquidators and authorized foreign representatives (the “JOLs” or “Petitioners”) of Charitable DAF Holdco, Ltd. (In Official Liquidation) (“HoldCo” or the “Debtor”) ~~in the, a company in liquidation under~~ Cayman Island ~~foreign proceeding (the “Cayman Proceeding”)~~ law, commenced under the relevant provisions of pursuant to the Cayman Islands Companies Act (2025 Revision) (~~the “Companies Act”~~) as Cause FSD No. 116 of 2025 (JAJ) before the Grand Court of the Cayman Islands (the “Cayman Court”), ~~and that on July 21, 2025 as Cause FSD No. 116 of 2025 (JAJ) (the “Cayman Proceeding”)~~, filed the Official Form 401 Petition [D.I. 1] and the Verified Petition for (I) Recognition of Foreign Main Proceeding, (II) Recognition of Foreign Representatives, and (III) Related Relief Under Chapter 15 of the Bankruptcy Code (~~together, the “Verified Petition”~~)² ~~and the Chapter 15 Petition for Recognition of a Foreign Proceeding for the Debtor (together with the Verified Petition, the “Petitions”)~~ pursuant to [D.I. 3], thereby commencing this proceeding ancillary to the Cayman Proceeding and seeking recognition of the Cayman Proceeding as a foreign main proceeding within the meaning under chapter 15 of title 11 of the United States Code (the “Bankruptcy Code”) with the United States Bankruptcy Court for the District of Delaware (the “Court”).

PLEASE TAKE FURTHER NOTICE that the ~~JOLs~~Petitioners seek the entry of an order (a) finding that (i) the Debtor is eligible to be a “debtor” under chapter 15 of the Bankruptcy Code, (ii) the Cayman Proceeding is a foreign main proceeding within the meaning of section 1502 of the Bankruptcy Code, (iii) the ~~JOLs~~ satisfyPetitioners satisfy the requirements of a “foreign representative” under section 101(24) of the Bankruptcy Code, and

¹ The Debtor is incorporated in the Cayman Islands as an exempted company and registered with registration number 170388. The Debtor’s registered office is located at HSM Corporate Services Limited, P.O. Box 31726, 68 Fort Street, George Town, Grand Cayman, KY1-1207, Cayman Islands.

² Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Verified Petition.

(iv) the ~~Petitions were~~Petition was properly filed and meets the requirements of section 1515 of the Bankruptcy Code; (b) granting recognition of the Cayman Proceeding as a “foreign main proceeding” under sections 1517 and 1520 of the Bankruptcy Code; (c) granting all relief afforded to foreign main proceedings under section 1520 of the Bankruptcy Code; (d) recognizing, granting comity to, and giving full force and effect within the territorial jurisdiction of the United States to the Cayman Proceeding, the Supervision Order, the Injunctive Relief Order, and other orders of the Cayman Court; (e) granting additional relief under sections 1521 and 1507 of the Bankruptcy Code; and (f) granting related relief.

PLEASE TAKE FURTHER NOTICE that on July 23, 2025, the Court ~~has~~ scheduled a hearing (on the “Recognition Hearing”)Petition to consider ~~the relief requested in the Petitions for [●]:[●].[●].m. (Eastern Time) on [●], 2025 in Room [●] of the~~ recognition of the Cayman Proceeding as a foreign main proceedings and granting related relief for August 14, 2025 at 11:00 a.m. (Eastern) before the Honorable Brendan Linehan Shannon in Courtroom 1 of the United States Bankruptcy Court for the District of Delaware, 824 North Market Street, Wilmington, Delaware, 19801(the “Recognition Hearing”).

PLEASE TAKE FURTHER NOTICE that copies of the ~~Petitions~~Petition and all documents filed in the Chapter 15 Case are available to parties in interest on the Court’s Electronic Case Filing System, which can be accessed from (i) the Court’s website at <http://www.deb.uscourts.gov> (a PACER login and password are required to retrieve a document); (ii) the JOLs’ website at <https://www.dolangrantthornton.ca/service/advisory/creditor-updates/#Charitable-DAF-Holdco-Ltd>; and (iii) upon written request to the Petitioners’ counsel (including by facsimile or e-mail) addressed to:

REED SMITH LLP

Jason D. Angelo, Esq.
1201 North Market Street, Suite 1500
Wilmington, DE 19801
Telephone: +1.302.778.7500
Facsimile: +1.302.778.7575
E-mail: ~~jangelo@reedsmit.com~~ jangelo@reedsmit.com

-and-

REED SMITH LLP

Casey Laffey, Esq.
Aaron Javian, Esq.
Ian M. Turetsky, Esq.
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New York, NY 100220
Telephone: +1.212.521.5400
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E-mail: ~~claffey@reedsmit.com~~ claffey@reedsmit.com
~~ajavian@reedsmit.com~~

ituretsky@reedsmith.com

rsolow@reedsmith.com

ajavian@reedsmith.com

ituretsky@reedsmith.com

rsolow@reedsmith.com

PLEASE TAKE FURTHER NOTICE that any party in interest wishing to submit a response, answer, or objection to the PetitionsPetition must do so pursuant to the Bankruptcy Code, the Federal Rules of Bankruptcy Procedure, and the Local Rules of Bankruptcy Practice and Procedure of the United States Bankruptcy Court for the District of Delaware, and such response, answer, or objection must (i) be in writing, (ii) set forth in detail the factual and legal bases therefor, (iii) be filed with the United States Bankruptcy Court for the District of Delaware, Office of the Clerk of the Court, 824 Market Street, Wilmington, Delaware 19801, and (iv) served upon counsel for the Petitioners, Reed Smith LLP, 1201 North Market Street, Suite 1500, Wilmington, DE 19801 (Attention: Jason D. Angelo, Esq.), and Reed Smith LLP, 599 Lexington Avenue, New York, NY 10022 (Attention: Casey Laffey, Esq., Aaron Javian, Esq., Ian M. Turetsky, Esq., and Richard C. Solow, Esq.), so as to be actually received on or before [●]August 7, 2025 at [●]:[●]:[●].m4:00 p.m. (Eastern Time).

PLEASE TAKE FURTHER NOTICE that all parties in interest opposed to the PetitionsPetition or the relief requested therein must appear at the Recognition Hearing at the time and place set forth above, which may be adjourned from time to time without further notice except for an in-Court announcement at the Recognition Hearing or a filing on the docket of this Chapter 15 Case of the date and time to which the Recognition Hearing has been adjourned.

PLEASE TAKE FURTHER NOTICE that, at the Recognition Hearing, the Court may order the scheduling of a case management conference to consider the efficient administration of the easesChapter 15 Case.

PLEASE TAKE FURTHER NOTICE that if no response or objection is timely filed and served as provided above, the Court may grant the relief requested in the Petitions without further notice or hearing.

PLEASE TAKE FURTHER NOTICE that the JOLsPetitioners do not currently intend to conduct a claims process in the Chapter 15 Case. To the extent there is a claims process established in the Cayman Proceeding, parties are directed to the Cayman Proceeding pending before the Cayman Court.

PLEASE TAKE FURTHER NOTICE that the Recognition Hearing may be adjourned from time to time without further notice other than an announcement in open court, or a notice of adjournment filed with the Court, of the adjourned date or dates at the hearing or any other further adjourned hearing.**THAT IF NO RESPONSES OR OBJECTIONS ARE RECEIVED IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE PETITIONERS WITHOUT FURTHER NOTICE OR HEARING.**

[Remainder of page intentionally left blank.]

Dated: July —[●], 2025
Wilmington, Delaware

Respectfully submitted,

REED SMITH LLP

By:

Jason D. Angelo (No. 6009)
1201 North Market Street, Suite 1500
Wilmington, DE 19801
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Facsimile: +1.302.778.7575
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jangelo@reedsmit.com

-and-

Casey Laffey, Esq. (*pro hac vice* forthcoming)
Aaron Javian, Esq. (*pro hac vice* forthcoming)
Ian M. Turetsky, Esq. (*pro hac vice* forthcoming)
Richard C. Solow, Esq. (*pro hac vice* forthcoming)

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*Counsel to Margot MacInnis and
Sandipan Bhowmik as Joint Official
Liquidators of Chapter 15 Debtor*

EXHIBIT B-2

Notice List

(Attached)

NOTICE PARTY SERVICE LIST**Via Email and/or First Class / International Mail**

NOTICE PARTY NAME	NOTICE PARTY ADDRESS
The United States Trustee	
Office of the United States Trustee	Joseph J. McMahon, Jr. Assistant United States Trustee United States Department of Justice – Office of The the United States Trustee J. Caleb Boggs Federal Building 844 N. King Street, Suite 2207, Lockbox 35 Wilmington, Delaware DE 19801 ustrustee.program@usdoj.gov ust.lap@usdoj.gov joseph.mcmahon@usdoj.gov
Chapter 15 Debtor and Foreign Representative	
Charitable DAF HoldCo, Ltd.	Grant Thornton Specialist Services (Cayman) Limited c/o Margot MacInnis and Sandipan Bhowmik 2nd Floor, Century Yard, Cricket Square P.O. Box 10144 Grand Cayman, Cayman Islands, KY 1-1102 margot.macinnis@uk.gt.com sandipan.bhowmik@uk.gt.com
Court Administering Foreign Proceeding	
Honourable Justice Parker Grand Court of the Cayman Islands	Karen Hoskins Grand Court of the Cayman Islands Financial Services Division 61 Edward St. Albert Panton St. P.O. Box 495 Grand Cayman, KY1-1106 Cayman Islands Karen.Hoskins@judicial.ky

FSD Registrar Grand Court of the Cayman Islands Financial Services Division	Bridget Clare Grand Court of the Cayman Islands Financial Services Division 61 Edward St. Albert Panton St. P.O. Box 495 Grand Cayman, KY1-1106 Cayman Islands Bridget.Clare@judicial.ky
---	---

Litigation Parties (Cayman Proceeding)	
Mark Eric Patrick	6716 Glenhurst Drive Dallas, Texas 72554 mpatricktax1040@gmail.com
Paul Murphy	Windsor Village #24 South Church Street Grand Cayman Cayman Islands paul@gkmanagement.com.ky
CDMCFAD, LLC	c/o Campbells LLP The Corporation Trust Company 1209 Orange Street Wilmington, Delaware 19801 RODoherty@campbellslegal.com RODoherty@campbellslegal.com
DFW Charitable Foundation	c/o Jennier Colegate & Nia Statham Baker & Partners LLP Buckingham Square 720 West Bay Road George Town Grand Cayman KY1-1107 jennifercolegate@bakerandpartners.com niastatham@bakerandpartners.com
CDH GP, LTD.	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com
CLO HOLDCO, LTD.	c/o Campbells LLP Floor 4, Willow House Cricket Square Grand Cayman KY1-9010 Cayman Islands RODoherty@campbellslegal.com

Discovery Parties	
BVP Property, LLC	2515 Mckinney Avenue, Suite 1100 Dallas, Texas 75201-1945 mpatricktax1040@gmail.com
BVP Property, LLC	c/o Corporation Trust Company Corporation Trust Center 1209 Orange Street, Wilmington New Castle, Delaware 19801 info@ctadvantage.com
Cantor Fitzgerald Securities Corp.	Erica Chase 100 Crescent Court, Suite 1500 Dallas, Texas 75201 Erica.chase@cantor.com
Carrington, Coleman, Sloman & Blumenthal, LLP	Brian P. Shaw Kelli M. Hinson 901 Main Street, Suite 5500 Dallas, Texas 75202-3767 khinson@ccsb.com
CDHC Assets LLC	c/o Mark Patrick 1999 Bryan Street, Suite 900 Dallas, Texas 75201-3140 mpatricktax1040@gmail.com cls-compliance@wolterskluwer.com
CDHC Fort Worth Land LLC	c/o Mark Patrick 1999 Bryan Street Suite 900 Dallas, Texas 75201-3140 mpatricktax1040@gmail.com cls-compliance@wolterskluwer.com
CDHC Royse City Land LLC	c/o Mark Patrick 1999 Bryan Street Ste 900 Dallas, Texas 75201-3140 mpatricktax1040@gmail.com cls-compliance@wolterskluwer.com
Dorsey & Whitney LLP	Amelia Messa 300 Delaware Avenue, Suite 1010 Wilmington, DE 19801 messa.amelia@dorsey.com

Discovery Parties	
FTI Consulting, Inc.	FTI Consulting, Inc. Alexis Anaman 200 Aldersgate Aldersgate Street London EC1A 4HD alexis.anaman@fticonsulting.com
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<u>Add</u>	156
<u>Delete</u>	358
<u>Move From</u>	0
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<u>Table Insert</u>	1
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<u>Table moves to</u>	0
<u>Table moves from</u>	0
Embedded Graphics (Visio, ChemDraw, Images etc.)	0
Embedded Excel	0
Format changes	0
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